

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

BODUM USA INC., and PI-DESIGN AG,

Plaintiffs,

v.

No. 1:23-cv-02946

STARBUCKS CORPORATION,

Defendant.

**DEFENDANT STARBUCKS CORPORATION'S RESPONSES AND OBJECTIONS TO  
PLAINTIFFS BODUM USA, INC. AND PI-DESIGN AG'S FIRST SET OF  
INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Starbucks Corporation ("Starbucks"), hereby responds and objects to Plaintiffs Bodum USA, Inc. and Pi-Design AG's First Set of Interrogatories (the "Interrogatories"). Each of the following responses is made only for the purposes of this action. Each response is subject to all objections as to relevance, materiality, and admissibility, and to any and all objections on any ground that would require exclusion of any response if it were introduced in court. All evidentiary objections are expressly reserved. Starbucks Corporation's responses are based on its present knowledge and information and it expressly reserves the right to amend or supplement its responses stated herein.

**OBJECTIONS TO DEFINITIONS**

1. Starbucks objects to the definition of "Starbucks" as vague and ambiguous to the extent it includes "affiliates" as acting on the behalf of or under the control of Starbucks Corporation. For the purpose of answering these Interrogatories, Starbucks shall interpret this term to mean Starbucks Corporation, and any predecessors, or Starbucks Corporation's directors,

officers, employees, agents, representatives, accountants, and/or anyone acting on Starbucks Corporation's behalf or under its control.

2. Starbucks objects to the definition of "Espro Press" as vague and ambiguous. For the purpose of responding to these Interrogatories, Starbucks shall interpret this term to mean the Espro French Press coffee maker sold by Starbucks as SKU 11133160.

### **ANSWERS AND OBJECTIONS TO INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

Identify each person whom you believe to have knowledge of information relevant to the subject matter of the action, to the extent that you have not already done so in your disclosures pursuant to Fed. R. Civ. P. 26(a)(1).

#### **ANSWER:**

Starbucks identified each person known to have information relevant to the subject matter of this action in its Initial Disclosures of Starbucks Corporation Under Federal Rule of Civil Procedure 26(a)(1), served July 28, 2023. Starbucks further incorporates any individuals identified in documents produced in response to Bodum's Requests for Production. Discovery is ongoing, and Starbucks reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e).

#### **INTERROGATORY NO. 2:**

Identify all individuals involved in auditing, tracking or approving the supply chain for products purchased from Bodum from 2008 to present.

#### **ANSWER:**

Starbucks objects to Interrogatory No. 2 as vague and ambiguous to the extent it calls for the identity of individuals "involved in" auditing, tracking, or approving the supply chain for products purchased from Bodum. Starbucks further objects to this Interrogatory as overbroad,

unduly burdensome, and not proportional to the needs of the case because it seeks information related to the supply chain for any “products purchased from Bodum from 2008 to present.” Starbucks interprets this Interrogatory as calling for the identification of Starbucks employees with direct knowledge of Starbucks supply chain for the Espro Press.

Subject to, and without waiving the foregoing objections and without waiving attorney-client privilege and work product protections, Starbucks answers as follows:

Person	Present or Last Known Address	Present or Last Known Place of Employment
Kate Ivy, Starbucks Group Manager, Product	C/O K&L Gates, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104, 206-623-7580	Starbucks
Gretchen Kulesza, Starbucks Senior Product Manager	C/O K&L Gates, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104, 206-623-7580	Starbucks
Chang Miao, Starbucks Sourcing Manager, Merchandise (former)	016 Barclay Way, Ann Arbor, MI 48105	Starbucks (former)
Sarah Taylor, Starbucks Senior Manager, Direct Sourcing, Innovative Sourcing	C/O K&L Gates, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104, 206-623-7580	Starbucks

Discovery is ongoing, and Starbucks reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e).

### **INTERROGATORY NO. 3:**

Identify all individuals with knowledge of Starbucks’s sales data related to the design, sourcing and/ or sale of the Espro Press.

### **ANSWER:**

Starbucks objects to this Interrogatory on grounds that “sales data related to the design, sourcing and/or sale” of the Espro Press is vague and ambiguous. Starbucks interprets this

interrogatory as seeking individuals with knowledge of sales data for the Espro Press. Subject to this objection and without waiving the attorney-client privilege or work product protection, Starbucks incorporates and restates its answer to Interrogatory No. 2. Discovery is ongoing, and Starbucks reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e).

**INTERROGATORY NO. 4:**

Identify all individuals with knowledge of the negotiation, execution and/or performance of the 2008 Settlement Agreement.

**ANSWER:**

Without waiving attorney-client privilege and work product protections, Starbucks answers as follows:

<b>Person</b>	<b>Present or Last Known Address</b>	<b>Present or Last Known Place of Employment</b>
Kathleen Albrecht, Starbucks VP Assistant General Counsel (former)	1516 E. Prospect Street, Seattle, WA 98112	Starbucks (former)
Joergen Bodum, Bodum Group CEO	C/O Vedder Price P.C., 222 N. LaSalle St., Chicago, Illinois 60601	Bodum Group
David E. Bennett, Vedder Price P.C. Partner (former)	C/O Vedder Price P.C., 222 N. LaSalle St., Chicago, Illinois 60601	Vedder Price P.C. (former)
Alain Grossenbacher, Bodum USA, Inc. CEO (former)	Contact information unknown to Starbucks.	Bodum USA, Inc. (former)
Kasper Himmelstrup, Bodum USA, Inc. CEO,	C/O Vedder Price P.C., 222 N. LaSalle St., Chicago, Illinois 60601	Bodum USA, Inc.
Julie Felss Masino, Starbucks Vice President, Category, Retail Transformation (former)	2517 Bayview Drive, Manhattan Beach, CA 90266	Starbucks (former)

Batur Oktay, Starbucks Managing Director (former)	346 NW 53rd St., Seattle, WA 98107	Starbucks (former)
Thomas Perez, Bodum USA, Inc. CEO (former)	Contact information unknown to Starbucks	Bodum USA, Inc. (former)
Harry Roberts, Starbucks Chief Creative Officer (former)	7160 No. Fork Rd. SE, Snoqualmie, WA 98065	Starbucks (former)
Bridgette Scheppat, Vice President Global Sourcing (former)	13627 SE 90th Place, Newcastle, WA 98059	Starbucks (former)

Discovery is ongoing, and Starbucks reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e).

**INTERROGATORY NO. 5:**

Identify all individuals with knowledge of Starbucks's actual or perceived obligations under the 2008 Settlement Agreement.

**ANSWER:**

Starbucks objects to this Interrogatory on grounds that “actual or perceived obligations under the 2008 Settlement Agreement” is vague and ambiguous. Starbucks further objects that this Interrogatory is overbroad and not proportional to the needs of the case. Starbucks interprets this interrogatory as seeking the identity of individuals with knowledge of the negotiation, execution and/or performance of the 2008 Settlement Agreement. Starbucks further objects that this Interrogatory seeks information protected by the attorney-client privilege or work product doctrine. Subject to, and without waiving the foregoing objections and without waiving attorney-client privilege and work product protections, Starbucks incorporates and restates its answer to

Interrogatory No. 4. Discovery is ongoing, and Starbucks reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e).

**INTERROGATORY NO. 6:**

Identify the first date of sale of the Espro Press.

**ANSWER:**

Without waiving the attorney-client privilege or work product doctrine, Starbucks answers as follows:

The date of first sale of the Espro Press was March 29, 2022.

Dated: October 2, 2023

Respectfully submitted,

/s/ Kari L. Vander Stoep

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*Counsel for Defendant Starbucks  
Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2023 a true and correct copy of the foregoing  
STARBUCKS REPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF  
INTERROGATORIES 1–6 was served upon Plaintiffs' counsel of record by electronic mail at  
the following address:

Robert S. Rigg  
Madeline V. Tzall  
Vedder Price P.C.  
222 North LaSalle Street  
Suite 2600  
Chicago, Illinois 60601

/s/ Kari L. Vander Stoep